1 2 3 4 5 IN THE UNITED STATES DISTRICT COURT 6 FOR THE WESTERN DISTRICT OF WASHINGTON 7 AT SEATTLE 8 UNITED FINANCIAL CASUALTY Cause No. 2:19-cy-00327-JLR COMPANY, an Ohio corporation, 9 STIPULATION AND ORDER Plaintiff, EXTENDING DEADLINES 10 v. 11 **BUSH ARCHITECTURAL EXCAVATING** CORP., an administratively dissolved 12 corporation; TERRY BUSH and LORI BUSH, and their marital community, d/b/a 13 "BUSH ARCHITECTURAL EXCAVATING"; JAMES BUSH and "JANE 14 DOE" BUSH, and their marital community; DAVID DEMOOR, in his capacity as 15 Personal Representative of the Estate of Pamela Sue Sellmer; L.A.S, a minor, through 16 her Litigation Guardian ad Litem; and DANIEL GERARD, an individual resident of 17 Washington State. 18 Defendants. 19 I. **STIPULATION** 20 Plaintiff United Financial Casualty Company (UFCC) and appearing defendants Daniel 21 Gerard and David Demoor hereby stipulate and agree that good cause exists for the Court to 22 extend the deadlines set in the Order Regarding Initial Disclosures, Joint Status Report, and 23 24 LETHER & ASSOCIATES PLLC

STIPULATION AND ORDER - 1

1848 Westlake Avenue N, Suite 100

SEATTLE, WA 98109 P: (206) 467-5444 F: (206) 467-5544 Early Settlement. Dkt. 11. The parties jointly ask that each of the deadlines be extended by thirty (30) days. The parties ask that the Court modify the deadlines as follows:

	Proposed Deadline
FRCP 26(f) Conference	6/21/2019
Initial Disclosures Pursuant to FRCP 26(a)(1)	7/5/2019
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f):	7/12/2019

Good cause exists for the above-described extensions. First, Defendant David Demoor appeared and Answered for the first time on until May 20, 2019, two days before the deadline for the Deadline for the Rule 26(f) Conference. Dkt. at 18, 20. Second, The Bush¹ Defendants have not appeared or answered, and a Default Order has been entered. Dkt. 14. A Motion for Default Judgment against the Bush Defendants is currently pending. Dkt. 15. The outcome of that motion will likely have a material effect on how the parties who have appeared wish to approach this case. Third, due to scheduling concerns, the parties who have appeared have not yet been able to identify any date before the current deadline that all counsel are available to conduct a Rule 26(f) conference.

As a result, the parties that have appeared in this action submit that good cause exists as to why the above-described deadlines should be extended.

DATED this 21st day of May, 2019.

¹ Defendants Bush Architectural Esc. Co., Terry and Lori Bush, and James and "Jane Doe" Bush are referred to collectively as "Bush".

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2	s/ Eric J. Neal
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12	Allor neys for Defendant Gerard Allor neys for Defendants Demotr and L.A.S
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14	
	II. ORDER
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	IT IS SO ORDERED.
16	NO
17	Dated this 22 day of May, 2019.
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19	Honorable James L. Robart
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STIPULATION AND ORDER - 3

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